

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Gold Shield of Indiana, Inc.
2004 Patterson Street
Decatur, Indiana 46733
and
2709 Patterson Street
Decatur, Indiana 46733

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 001-6067-00043	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom molded fiberglass reinforced products source.

Responsible Official:	Pete Stephenson
Source Addresses:	2004 Patterson Street, Decatur, Indiana 46733; and 2709 Patterson Street, Decatur, Indiana 46733
Mailing Address:	P.O. Box 496, Decatur, Indiana 46733
Phone Number:	219-728-2476
SIC Code:	3089
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Building 43-1

- (a) One (1) lamination and gel coat booth, identified as PC1, constructed in 1994, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
- (b) One (1) lamination and gel coat booth, identified as PC2, constructed in 1982, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
- (c) One (1) gel coat booth, identified as GB2, constructed in 1982, using impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.
- (d) One (1) lamination booth, identified as LB1, constructed in 1982, using flow coaters and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Building 43-2:

- (g) Three (3) gel booths, identified as GB1, GB2, and GB3, installed in 1985, using impingement guns and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.
- (h) Four (4) chop booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using flow coaters and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.
- (i) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
 - (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (2) One (1) prime booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
 - (4) One (1) prime booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
 - (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
 - (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
 - (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
- (j) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.
- (k) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, equipped with dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
[326 IAC 6-3-2]

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a

claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except

for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and

reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the opacity shall not exceed an average of five percent (5%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (d) Pursuant to CP 001-4127-00037, issued on October 17, 1995, opacity shall not exceed five percent (5%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75

cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

C.11 Compliance Schedule

The annual emission statement required pursuant to 326 IAC 2-6 covering the applicable operating quarters of 1999 shall be submitted within ninety (90) days of the issuance of this permit.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Air Quality Analysis Requirements [326 IAC 2-2-4]

Pursuant to CP 001-4127-00037, issued on October 17, 1995, and 326 IAC 2-2-4 (Air Quality Analysis Requirements) post construction ambient ozone monitoring must be conducted for a period of one (1) year utilizing a methodology and time frame that is acceptable to the commissioner. The post-construction monitoring required was to commence within two (2) years of issuance of this

permit.

C.13 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ, when applicable). The CRP shall

be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three

(3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Building 43-1

- (a) One (1) lamination and gel coat booth, identified as PC1, constructed in 1994, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
- (b) One (1) lamination and gel coat booth, identified as PC2, constructed in 1982, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
- (c) One (1) gel coat booth, identified as GB2, constructed in 1982, using impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11, capacity: 1,200 square feet of fiberglass parts per hour.
- (d) One (1) lamination booth, identified as LB1, constructed in 1982, using flow coaters and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Building 43-2:

- (g) Three (3) gel booths, identified as GB1, GB2, and GB3, installed in 1985, using impingement guns and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.
- (h) Four (4) chop booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using flow coaters and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.
- (i) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
 - (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Facility Description [326 IAC 2-7-5(15)]: (continued)

- (2) One (1) prime booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
- (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
- (4) One (1) prime booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
- (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
- (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
- (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.
- (j) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2-3] [326 IAC 8-1-6]

- (a) Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:
 - (1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the total source, excluding combustion, shall be no more than 724 tons per twelve (12) consecutive month period. These VOC emissions shall be calculated on a daily basis with the weekly average, based on a six working day week, not to exceed the daily emission rate of 2.41 tons per day. Compliance with this limit shall be determined based upon the following criteria:
 - (A) Weekly usage by weight, monomer content that is VOC, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application

and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (B) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

- (2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) - (Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other

emission reduction techniques for each gel coat and resin used.

- (3) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (4) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) The listed work practices shall be followed:
- (A) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.
 - (B) For VOC and/or HAP containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (C) All material storage containers shall be kept covered when not in use.

- (b) Pursuant to CP 001-3261-00010, issued on March 11, 1994, BACT for the paint system at Plant 43-2, identified as PS, shall be the use of high volume, low pressure (HVLP) spray guns, and use of coatings with a solid content not less than 49.6% by volume and no more than 3.59 pounds VOC per gallon of coating, less water.
- (c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the spray booth (P1) of Building 43-1, originally planned for construction at Building 43-3, shall utilized high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.
- (d) The one (1) paint booth (PB1) at Plant 43-1 shall utilized high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water. Therefore, the requirement of annual report of control measures used in PC (01) 1805, issued on February 9, 1990, is not applicable.
- (e) The following conditions are no longer applicable to the facilities at this source:
 - (1) Operation Condition 4 from CP 001-4235-00018, issued on April 20, 1995, which states that the total amount of volatile organic compounds including cleanup solvents delivered to the coating applicators shall be limited to no more than 24.9 tons per 12-month period and is limited to a fixed monthly limit of 4,150 pounds. The organic content of the gelcoats shall be multiplied by a 35% flashoff factor to obtain the gelcoat and resin VOC emissions. Satisfaction of this condition and the Operating Conditions shall render the Best Available Control Technology Rule (326 IAC 8-1-6) not applicable in this case.
 - (2) Operation Condition 4 from PC (01) 1805, issued on February 9, 1990, which states that the input of volatile organic compounds shall be limited to 174.45 tons per month (2093.4 tons per year) total (base don 11% emission of unreacted styrene) for the gelcoat booth (B-1) and the resin spray booth (B-2) and 1.56 tons per month (18.7 tons per year) total for the grinding booth (B-3) and the paint booth (B-4). Therefore state and federal rules for the Prevention of Significant Deterioration do not apply.
 - (3) Operation Condition 5 from CP 001-3990-00018, issued on February 13, 1995, which states that pursuant to 326 IAC 8-1-6, these facilities shall comply with Best Available Control Technology (BACT). BACT shall consist of:
 - (A) the use of an airless spray application method
 - (B) a maximum VOC emissions rate (including clean up solvents) of 608 pounds per day
 - (4) Operation Condition 4 of CP 001-3261-00010, issued on March 11, 1994, which states that VOC solvent input (including clean-up solvents) to the applicators is limited to no more than 50 tons per 365-day period rolled on a daily basis, was not included in CP 001-4127-00037, issued on October 17, 1995, and is no longer applicable.

These conditions are not incorporated into this permit because, due to the change in the emission factors for fiberglass operations, the emissions from these facilities have changed. Therefore, all fiberglass operations are included in the BACT in this permit.

- (f) Operation Conditions 5(b), (c), (d), (e), and (f) (iv) through (vi) from CP 001-4127-00037, issued on October 17, 1995 are no longer applicable. The conditions and reasons they are not applicable are as follows:
- (1) Condition 5(b), which states that this source shall be limited to a production schedule of 300 days per year and compliance with this limit shall be considered satisfied provided that daily records, as approved by the commissioner demonstrating compliance with operation Condition 5(b) shall be maintained for a minimum period of two years and made available to the Office of Air Quality upon request, is not applicable because the source is taking a limit on the amount of VOC used annually. Therefore, limiting the operating hours of the plant does not decrease the emissions and can only increase the concentration of emissions in a given time period.
 - (2) Condition 5(c), which states that the total amount of acetone used at this source shall be limited to 14.83 tons per month is not applicable because acetone has since been determined to be an exempt solvent
 - (3) Condition 5(d), which states that the styrene monomer content of the resins used in the chop booth operations shall not exceed an annual weighted average of 50%, with the styrene monomer content of each individual resin used not to exceed 55% by weight, is not applicable because these limits are replaced in (a) in this condition by the monomer content limits based upon current information regarding available materials.
 - (4) Condition 5(f)(iv), (v) and (vi), which state that the overspray shall be minimized by spraying as close as practical into the molds, the application equipment operators shall be instructed and trained in the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters, and the parts shall be placed underneath infrared lights to decrease the gelation time as required by ambient temperature conditions, are not applicable because the pollution prevention techniques are replaced in (a) of this condition by techniques determined to be part of BACT based upon current information.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer, and by Conditions D.1.1(a)(1) and (2). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each week based on the average daily VOC usage for each week and the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.6 Particulate Matter (PM)

The dry filters and water wash system for PM control shall be in operation at all times when the equipment exhausting to those control devices are in operation. Pursuant to CP 001-4127-00037, issued on October 17, 1995, the recirculation-type dust blow-off booth shall be operated at all times so that no PM escapes from the two (2) prime spray booths into the sanding room or into the ambient air. This shall be achieved by the use of replacement filters in the exhaust plenums, air recirculation and maintenance of negative pressure inside the dust blow off booth.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, and one (1) paint booth (PB1) at Plant 43-2, stacks (At Plant 43-1: B-1-1 through B-1-3, B-1-9, B-1-11 through B-1-14, C-1-1 through C-1-3, and P1; At Plant 43-2: B-1-1 through B-1-6, B-2-1 through B-2-14, C-3-1, C-3-2, C-3-4, C-3-5, B-4-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Daily inspections shall be performed to verify that the water level of the water wash system meets the manufacturer's recommended level. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from prime booths 1 and 2 in the one (1) paint system (PS) at Plant 43-2, stacks (C-3-1, C-3-2, C-3-4 and C-3-5) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Condition D.1.1.
 - (1) The amount, VOC content of each resin, gel coat, coating and solvent. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The VOC monomer content for resins and gel coats calculated on an equivalent mass basis for each month in which noncompliant resins or gel coats are used.
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month;
 - (6) The average daily weight of VOCs emitted based on calculated weekly emissions and of a six-day working week; and
 - (7) The VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.6 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the water wash systems, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (k) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, using dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiber-glass parts per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each of the three (3) dust booths shall not exceed 3.65 pounds per hour when operating at a process weight rate of 1,680 pounds per hour (0.84 tons per hour).

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Operation Condition 4 from CP 001-3592-00010, issued on June 24, 1994, which states that particulate matter (PM) emissions shall not exceed 1.32 pounds per hour and the booths shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity, is no longer applicable because the process weight rate of the dust booths, which hold sanding operations, are re-evaluated in CP 001-4127-00037, issued on October 17, 1995 and the allowable PM emissions are as indicated in (a) of this condition.

Compliance Determination Requirement

D.2.2 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the dust booths exhausting to the filters are in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the insignificant machining operations, trimming, brazing equipment, cutting torches, soldering equipment, and welding equipment shall each not exceed 0.551 pounds per hour, when operating at a process weight rate of less than 100 pounds per hour, each. This limit is based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirement

D.3.2 Particulate Matter (PM)

- (a) The control devices PM control shall be in operation at all times when the facilities exhausting to the control devices are in operation.
- (b) Operation Condition 4 from CP 001-2515-00010, issued on September 23, 1992, which states that the particulate matter from the fiberglass machining facilities shall be considered in compliance with 326 IAC 6 provided that visible emissions do not exceed 10% opacity, baghouse pressure drop is not less than 3 inches of water, and no public nuisance is created is not applicable because no compliance monitoring is required for these insignificant activities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street, Decatur, Indiana 46733, and
2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 496, Decatur, Indiana 46733
Part 70 Permit No.: T 001-6067-00043

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street, Decatur, Indiana 46733, and
2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 496, Decatur, Indiana 46733
Part 70 Permit No.: T 001-6067-00043

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street, Decatur, Indiana 46733, and
2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 496, Decatur, Indiana 46733
Part 70 Permit No.: T 001-6067-00043
Facility: Entire source (Plants 43-1 and 43-2), excluding combustion units
Parameter: Total VOC emissions
Limit: Average daily emissions of 2.41 tons per day based on weekly VOC emissions and a six (6) -day week

Months: _____ Year: _____

Day	Month 1 VOC emissions (tons)	Month 2 VOC emissions (tons)	Month 3 VOC emissions (tons)	Day	Month 1 VOC emissions (tons)	Month 2 VOC emissions (tons)	Month 3 VOC emissions (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street, Decatur, Indiana 46733, and
2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 496, Decatur, Indiana 46733
Part 70 Permit No.: T 001-6067-00043
Facility: Entire source (Plants 43-1 and 43-2), excluding combustion units
Parameter: Total VOC emissions
Limit: Less than 724 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Gold Shield of Indiana, Inc.
Source Address: 2004 Patterson Street, Decatur, Indiana 46733, and
2709 Patterson Street, Decatur, Indiana 46733
Mailing Address: P.O. Box 496, Decatur, Indiana 46733
Part 70 Permit No.: T 001-6067-00043

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #):

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #):

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #):	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #):	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #):	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Gold Shield of Indiana Inc.
Source Location: 2004 Patterson Street, Decatur, Indiana 46733 and
2709 Patterson Street, Decatur, Indiana 46733
County: Adams
SIC Code: 3089
Operation Permit No.: T 001-6067-00043
Permit Reviewer: CarrieAnn Ortolani

On November 22, 2000, the Office of Air Quality (OAQ) had a notice published in the Decatur Daily Democrat, Decatur, Indiana, stating that Gold Shield of Indiana Inc. had applied for a Part 70 Operating Permit to operate a custom molded fiberglass reinforced products source with dry filters as control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Gold Shield of Indiana Inc.
Source Locations:	2004 Patterson Street, Decatur, Indiana 46733 and 2709 Patterson Street, Decatur, Indiana 46733
County:	Adams
SIC Code:	3089
Operation Permit No.:	T 001-6067-00043
Permit Reviewer:	CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Gold Shield of Indiana Inc. relating to the operation of a custom molded fiberglass reinforced products source.

Source Definition

This custom molded fiberglass reinforced products company consists of two (2) plants:

- (a) Plant 43-2 is located at 2004 Patterson Street, Decatur, Indiana; and
- (b) Plant 43-1 is located at 2709 Patterson Street, Decatur, Indiana.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Another building, Plant 43-3, was permitted in CP 001-4127-00037, issued on October 17, 1995. The plant was never constructed and no construction is anticipated at this time. The plant will not be included in the Part 70 Operating Permit.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Building 43-1

- (a) One (1) lamination and gel coat booth, identified as PC1, constructed in 1994, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of resin per hour.
- (b) One (1) lamination and gel coat booth, identified as PC2, constructed in 1982, using flow coaters and impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-1 through B-1-3, capacity: 375 square feet of fiberglass parts per hour.
- (c) One (1) gel coat booth, identified as GB2, constructed in 1982, using impingement guns and equipped with dry filters as overspray control, exhausting to Stacks B-1-9 and B-1-11,

capacity: 1,200 square feet of fiberglass parts per hour.

- (d) One (1) lamination booth, identified as LB1, constructed in 1982, using flow coaters and equipped with dry filters as overspray control, exhausting to Stacks B-1-12 through B-1-14, capacity: 1,200 square feet of material per hour.
- (e) One (1) spray booth, identified as SB1, constructed in 1993, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stacks C-1-1 through C-1-3, capacity: 69 square feet of fiberglass parts per hour.
- (f) One (1) paint booth, identified as P1, constructed in 1995, using high volume, low pressure (HVLP) spray equipment and equipped with dry filters for overspray control, exhausting to Stack P1, capacity: 69 square feet of fiberglass parts per hour.

Building 43-2:

- (g) Three (3) gel booths, identified as GB1, GB2, and GB3, installed in 1985, using impingement guns and equipped with dry filters as overspray control, exhausting to stacks B-1-1 through B-1-6, capacity: 1250 square feet of fiberglass parts per hour, each.
- (h) Four (4) chop booths, identified as CB1, CB2, CB3 and CB4, installed in 1985, using flow coaters and equipped with dry filters as overspray control, exhausting to stacks B-2-1 through B-2-14, capacity: 1250 square feet of fiberglass parts per hour, each.
- (i) One (1) paint system, identified as PS, installed in 1994, equipped with a water wash system as overspray control and consisting of the following equipment:
 - (1) One (1) tack-off booth, exhausting to stack C-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (2) One (1) prime booth 1, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-1 and C-3-2, capacity: 1250 square feet of fiberglass parts per hour.
 - (3) One (1) flash-off room, exhausting to stack C-3-3, capacity: 1250 square feet of fiberglass parts per hour.
 - (4) One (1) prime booth 2, equipped with high volume, low pressure (HVLP) spray guns, exhausting to stacks C-3-4 and C-3-5, capacity: 1250 square feet of fiberglass parts per hour.
 - (5) One (1) flash-off room, exhausting to stack C-3-6, capacity: 1250 square feet of fiberglass parts per hour.
 - (6) One (1) cure oven, fired by natural gas, exhausting to stack C-4, capacity: 1250 square feet of fiberglass parts per hour and 4.15 million British thermal units per hour.
 - (7) One (1) recirculation type dust blow-off booth with no external exhaust, equipped with an internal recirculation exhaust system with an air flow rate of 25,000 dry standard cubic feet per minute.

- (j) One (1) paint booth, identified as PB1, installed in 1985, using high volume, low pressure (HVLP) spray guns and equipped with dry filters for overspray control, exhausting to stack B-4-1, capacity: 1250 square feet of fiberglass parts per hour.
- (k) Three (3) dust booths, identified as D-1, D-2, and D-3, installed in 1994, equipped with dry filters, exhausting to stacks D-1-1, D-1-2, and D-2-1 through D-2-4, capacity: 1250 square feet of fiberglass parts per hour, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:
 - (1) In building 43-1, six (6) air makeup units, total capacity: 17 million British thermal units per hour.
 - (2) In building 43-2, air makeup units, total capacity: 43.44 million British thermal units per hour.
- (e) Closed loop heating and cooling systems.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Blowdown or any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (i) One (1) infrared gel oven, identified as Gel Oven, installed in 1985, exhausting to stacks B-1-7 and B-1-8, capacity: 1250 square feet of fiberglass parts per hour.
- (j) One (1) infrared chop oven, identified as Oven, installed in 1985, exhausting to stacks B-2-15 and B-2-16, capacity: 1250 square feet of fiberglass parts per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 01-09-89-0125, issued on September 5, 1985;
- (b) CP 001-3990-00018, issued on February 13, 1995;
- (c) CP 001-4235-00018, issued on April 20, 1995;
- (d) PC (01) 1805, issued on February 9, 1990;
- (e) CP 001-2515-00010, issued on September 23, 1992;
- (f) CP 001-3592-00010, issued on June 24, 1994;
- (g) Interim CP 001-4013-00018, issued on September 12, 1994;
- (h) CP 001-3261-00010, issued on March 11, 1994;
- (i) CP 001-4127-00037, issued on October 17, 1995;
- (j) Administrative Approval CP 001-6578-00010, issued on December 3, 1996;
- (k) SSOA 001-5852-00010, issued on May 13, 1996; and
- (l) Exemption CP 001-5753-00010, issued on May 13, 1996.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 001-4235-00018, issued on April 20, 1995

Operation Condition 4: That total amount of volatile organic compounds including cleanup solvents delivered to the coating applicators shall be limited to no more than 24.9 tons per 12-month period and is limited to a fixed monthly limit of 4,150 pounds. The organic content of the gelcoats shall be multiplied by a 35% flashoff factor to obtain the gelcoat and resin VOC emissions. Satisfaction of this condition and the Operating Conditions shall render the Best Available Control Technology Rule (326 IAC 8-1-6) not applicable in this case.

Reason not incorporated: Due to the change in the emission factors for fiberglass operations, the emissions from these facilities have changed. Therefore, all fiberglass operations are included in the BACT in this permit.

- (b) PC (01) 1805, issued on February 9, 1990

Operation Condition 4: That input of volatile organic compounds shall be limited to 174.45 tons per month (2093.4 tons per year) total (based on 11% emission of unreacted styrene) for the gelcoat booth (B-1) and the resin spray booth (B-2) and 1.56 tons per month (18.7 tons per year) total for the grinding booth (B-3) and the paint booth (B-4). Therefore state and federal rules for the Prevention of Significant Deterioration do not apply.

Reason not incorporated: Due to the change in the emission factors for fiberglass operations, the emissions from these facilities have changed. Therefore, all fiberglass operations are included in the BACT in this permit.

- (c) CP 001-2515-00010, issued on September 23, 1992

Operation Condition 4: That the particulate matter from the fiberglass machining facilities shall be considered in compliance with 326 IAC 6 provided that:

- (a) visible emissions do not exceed 10% opacity;
- (b) baghouse pressure drop is not less than 3 inches of water.
- (c) no public nuisance is created.

Reason not incorporated: These emission units are insignificant activities. Therefore, no compliance monitoring is required.

- (d) CP 001-3592-00010, issued on June 24, 1994

Operation Condition 4: That particulate matter (PM) emissions shall not exceed 1.32 pounds per hour. Booths shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity.

Reason not incorporated: The process weight rate of the dust booths, which hold sanding operations, were re-evaluated in CP 001-4127-00037, issued on October 17, 1995. The allowable PM emissions are higher than this limit.

- (e) CP 001-3990-00018, issued on February 13, 1995

Operation Condition 5: That pursuant to 326 IAC 8-1-6, these facilities shall comply with Best Available Control Technology (BACT). BACT shall consist of:

- (a) the use of an airless spray application method
- (b) a maximum VOC emissions rate (including clean up solvents) of 608 pounds per day

Reason not incorporated: Due to the change in the emission factors for fiberglass operations, the emissions from these facilities have changed. Therefore, all fiberglass operations are included in the BACT in this permit.

- (f) CP 001-4127-00037, issued on October 17, 1995

Operation Conditions 5(b), (c), (d) and (f) (iv) through (vi):

- (b) That this source shall be limited to a production schedule of 300 days per year. Compliance with this limit shall be considered satisfied provided that daily records, as approved by the commissioner demonstrating compliance with operation Condition 5b shall be maintained for a minimum period of two years and made available to the Office of Air Management upon request.

- (c) That the total amount of acetone used at this source shall be limited to 14.83 tons per month.
- (d) That the styrene monomer content of the resins used in the chop booth operations shall not exceed an annual weighted average of 50%, with the styrene monomer content of each individual resin used not to exceed 55% by weight.
- (f) That the following pollution prevention techniques are applied:
 - (iv) that the overspray shall be minimized by spraying as close as practical into the molds,
 - (v) that the application equipment operators shall be instructed and trained in the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters, and
 - (vi) that the parts shall be placed underneath infrared lights to decrease the gelation time as required by ambient temperature conditions.

Reasons not incorporated: Condition 5(b) is not necessary because the source is taking a limit on the amount of VOC used annually. Therefore, limiting the operating hours of the plant does not decrease the emissions and can only increase the concentration of emissions in a given time period. Condition 5(c) is not necessary because acetone is an exempt solvent. The styrene monomer content limit in Condition 5(d) will be replaced by the monomer content limits in the BACT determined in this permit. These content limits are based upon current information regarding available materials. The pollution prevention techniques in Condition 5(f) (iv) through (vi) will be replaced by the techniques in the BACT determined in this permit. These techniques are based upon current information.

- (g) CP 001-3261-00010, issued on March 11, 1994

The requirement of Operation Condition 4 which states that VOC solvent input (including clean-up solvents) to the applicators of no more than 50 tons per 365-day period rolled on a daily basis.

Reason not incorporated: The solvent input, including cleanup solvents, limit of no more than 50 tons per 365-day period, rolled on a daily basis, was not included in CP 001-4127-00037, issued on October 17, 1995, and will be removed from this permit. These facilities to which this limit applied are included in the BACT VOC emission limit for the entire source, except combustion, in this permit.

Enforcement Issue

An enforcement referral has been made because the source is delinquent in submitting their emission statements for 1999.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Two administratively incomplete Part 70 permit applications for the purposes of this review were received on June 4, 1996. Additional information received on September 3, 1996 makes the Part 70 permit application administratively complete. Additional information was received on August 22, 2000, September 8, 2000, September 14, 2000, via telephone, and November 13, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 7 of 7 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2,990
PM ₁₀	2,990
SO ₂	1.00
VOC	1,335
CO	26.0
NO _x	31.0

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Styrene	690
Methyl methacrylate	117
Xylene	9.00
Toluene	10.8
Toluene - 2, 4, - diisocyanate	0.639
MIBK	9.45
Glycol Ethers	75.2

HAPs	Potential To Emit (tons/year)
Formaldehyde	1.98
Hexamethylene diisocyanate	0.437
TOTAL	915

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM₁₀ are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	14.7
PM ₁₀	3.02
SO ₂	not reported
VOC	351
CO	not reported
NO _x	not reported
HAPs	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM₁₀	SO₂	VOC	CO	NO_x	HAPs
Plants 43-1 and 43-2, excluding dust booths	11.9	11.9	0.00	724	0.00	0.00	498
Three (3) dust booths	20.6	20.6	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	10.0	10.0	1.00	5.00	26.0	31.0	1.00
Total Emissions	42.5	42.5	1.00	729	26.0	31.0	499

County Attainment Status

The source is located in Adams County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Adams County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability. However, this source is a major source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit VOC is greater than 250 tons per year. Therefore, this source is a major PSD source pursuant to 326 IAC 2-2. A PSD review was performed with CP 001-4127-00037, issued on October 17, 1995.

326 IAC 2-2-3 (PSD Rule: best available control technology)

Pursuant to CP 001-4127-00037, issued on October 17, 1995, the source is subject to this rule. Compliance with 326 IAC 8-1-6 will ensure compliance with this rule. A complete description of the BACT determined pursuant to 326 IAC 2-2-3 is under 326 IAC 8-1-6, New facilities; General reduction requirements, in the State Rule Applicability - Individual Facilities section of this document.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the opacity shall not exceed an average of five percent (5%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (d) Pursuant to CP 001-4127-00037, issued on October 17, 1995, opacity shall not exceed five percent (5%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since all facilities were constructed prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters and water wash system shall be in operation at all times the facilities exhausting to each dry filter or water wash system are in operation, in order to comply with this limit. Pursuant to CP 001-4127-00037, issued on October 17, 1995, the recirculation-type dust blow-off booth shall be operated at all times so that no PM escapes from the two (2) prime spray booths into the sanding room or into the ambient air. This shall be achieved by the use of replacement filters in the exhaust plenums, air recirculation and maintenance of negative pressure inside the dust blow off booth.

- (b) The particulate matter (PM) from the insignificant machining operations, trimming, brazing equipment, cutting torches, soldering equipment, and welding equipment shall each be limited to 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour, each. This limitation is calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The control devices shall be in operation at all times the facilities exhausting to each control device are in operation, in order to comply with this limit.

- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each of the three (3) dust booths shall not exceed 3.65 pounds per hour when operating at a process weight rate of 1,680 pounds per hour (0.84 tons per hour).

The filters connected to each of the three (3) dust booths shall be in operation at all times the dust booths are in operation, in order to comply with this limit. The PM emissions from each dust booth after controls are 1.56 pounds per hour which is less than the allowable PM emission rate of 3.65 pounds per hour. Therefore, each of the three (3) dust booths are in compliance with this rule.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) The fiberglass operations are subject to 326 IAC 8-1-6 because all operations were constructed after January 1, 1980, the potential to emit VOC is greater than 25 tons per year, and the facilities are governed by no other provisions of Article 8. Pursuant to this rule, a Best Available Control Technology (BACT) Analysis is required. BACT for this facility was previously determined in CP 001-4127-00037, issued on October 17, 1995. This determination has been revised in light of new emission factors developed by the Composite Fabricators Association (CFA). Also, the resin and gel coat operations at Plant 43-1 will be incorporated into the BACT.

Pursuant to the determination of Best Available Control Technology for VOC emissions from resin and gel coat application operations at the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, one (1) spray booth (SB1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, and four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, the Permittee shall comply with the following conditions:

- (1) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the use of gel coats, resins, solvents and coatings shall be limited such that the potential to emit (PTE) VOCs from the total source, excluding combustion, shall be no more than 724 tons per twelve (12) consecutive month period. These VOC emissions shall be calculated on a daily basis with the weekly average, based on a six working day week, not to exceed the daily emission rate of 2.41 tons per day. Compliance with this limit shall be determined based upon the following criteria:
- (A) Weekly usage by weight, monomer content that is VOC, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic compound emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.
- (B) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: "Unified Emission Factors for Open Molding of

Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

- (2) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content % by weight
Production ¹ Gel Coat	37
Tooling ² Gel Coat	38
Production Resin	35
Tooling Resin	43

¹ Production refers to the manufacture of parts.

² Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAM may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -
(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) - (Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) *
EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

- (3) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and

specifications approved by IDEM, OAM.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

- (4) Optimized spray techniques according to a manner approved by IDEM, OAM shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAM, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (5) The listed work practices shall be followed:
 - (A) To the extent possible, non-VOC, non-HAP solvent shall be used for cleanup.
 - (B) For VOC and/or HAP containing materials:
 - (i) Cleanup solvent containers shall be used to transport solvent from drums to work.
 - (ii) Cleanup stations shall be closed containers having soft gasketed spring-loaded closures and shall be kept completely closed when not in use.
 - (iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
 - (iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
 - (v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
 - (C) All material storage containers shall be kept covered when not in use.
- (b) The one (1) paint system at Plant 43-2 (PS) for coating fiberglass parts at Plant 43-2 is subject to 326 IAC 8-1-6 because the facility was constructed after January 1, 1980, the potential to emit VOC is greater than 25 tons per year, and the facilities are governed by no other provisions of Article 8. Pursuant to CP 001-3261-00010, issued on March 11, 1994, BACT for the one (1) paint system at Plant 43-2 (PS) is the use of high volume, low pres-

sure (HVLP) spray guns, and use of coatings with a solid content not less than 49.6% by volume and no more than 3.59 pounds VOC per gallon of coating, less water. The solvent input, including cleanup solvents, limit of no more than 50 tons per 365-day period, rolled on a daily basis, was not included in CP 001-4127-00037, issued on October 17, 1995, and will not be included in this permit. The emissions from this facility will be included in the BACT limit in (a)(1).

- (c) Pursuant to CP 001-4127-00037, issued on October 17, 1995, the spray booth (P1) of Building 43-1, originally planned for construction at Building 43-3, shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.
- (d) The one (1) paint booth (PB1) at Plant 43-2 for coating fiberglass parts at Plant 43-2 are subject to 326 IAC 8-1-6 because all operations were constructed after January 1, 1980, the potential to emit VOC is greater than 25 tons per year, and the facilities are governed by no other provisions of Article 8. Pursuant to PC (01) 1805, issued on February 9, 1990, BACT for the one (1) paint booth (PB1) is the use of advancements in manufacturing technologies and raw materials as they are developed. Since CP 001-4127-00037, issued on October 17, 1995, included a BACT for the booth intended for construction at Plant 43-3 and installed at 43-1, the source has agreed to the requirements of that BACT for this booth. Therefore, the one (1) paint booth (PB1) shall utilize high-volume, low-pressure (HVLP) spray application with relatively high solids, low VOC coatings. HVLP application shall be considered achieved provided that the pressure of the applicators does not exceed 10 psi. Further, these coating operations shall be limited such that the solids content of the coating as applied shall not be less than 49.6% by volume, and the coating as applied shall not contain more than 5.5 lb VOC per gallon coating less water.

Testing Requirements

Pursuant to CP 001-4127-00037, issued on October 17, 1995, and 326 IAC 2-1-3 (Construction and Operating Permit Requirements), compliance stack tests were performed for PM from grinding operations at Plants 43-2 and 43-3 within 60 days after achieving maximum production rate, but no later than 180 days after initial startup. Plant 43-3 was never constructed. Stack tests were performed on one (1) dust booth at Plant 43-2 on May 21, 1997. The results of the test were used in the emission calculations for the dust booths. There is no further testing required at this time.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Pursuant to CP 001-4127-00037, issued on October 17, 1995, and 326 IAC 2-2-4 (Air Quality Analysis Requirements) post construction ambient ozone monitoring must be conducted for a period of one year utilizing a methodology and time frame that is acceptable to the commissioner. The post-construction monitoring required was to commence within two (2) years of operation. Since Plant 43-3 was not constructed, IDEM, OAM did not require the source to do the ozone monitoring within two (2) years. Since Plant 43-1 is considered part of the same source and the source has agreed that it is a major PSD source, ozone monitoring will be required by this permit.
- (b) The two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, one (1) paint system (PS) at Plant 43-2, consisting of two (2) prime booths, and one (1) paint booth (PB1) at Plant 43-2 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) lamination and gel coat booths at Plant 43-1 (PC1 and PC2), one (1) gel coat booth at Plant 43-1 (GB2), one (1) lamination booth (LB1) at Plant 43-1, two (2) spray booths (SB1 and P1) at Plant 43-1, three (3) gel booths (GB1, GB2 and GB3) at Plant 43-2, four (4) chop booths (CB1, CB2, CB3 and CB4) at Plant 43-2, and one (1) paint booth (PB1) at Plant 43-2, stacks (At Plant 43-1: B-1-1 through B-1-3, B-1-9, B-1-11 through B-1-14, C-1-1 through C-1-3, and P1; At Plant 43-2: B-1-1 through B-1-6, B-2-1 through B-2-14, C-3-1, C-3-2, C-3-4, C-3-5, B-4-1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Daily inspections shall be performed to verify that the water level of the water wash system meets the manufacturer's recommended level. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. In addition, weekly observations shall be made of the overspray from prime booths 1 and 2 in the one (1) paint system (PS) at Plant 43-2, stacks (C-3-1, C-3-2, C-3-4 and C-3-5) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (3) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence

of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters and water wash system must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this custom molded fiberglass reinforced products source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 001-6067-00043**.

Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
2709 Patterson Street, Decatur, Indiana 46733
Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 1996

Plant 43-1

Material	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Transfer Efficiency	Tons of Styrene per year	Tons of MMA per year
RESIN														
STYPOL 40-2832	10.70	27.27%	0.00%	58.35	0.00	0.075	850.00	19.89	477.42	87.13	651.69	70.00%	87.13	0.00
COR 61 AA 810W	10.84	36.00%	0.00%	80.00	0.00	0.075	850.00	27.65	663.53	121.09	581.25	70.00%	121.09	0.00
GELCOAT														
944 WA 601 POLYCOP OFF WHITE	10.87	30.72%	4.96%	273.41	75.00	0.019	850.00	30.58	733.83	133.92	151.86	70.00%	105.09	28.83
944 WA 605 OXFORD WHITE	10.87	30.72%	4.96%	273.41	75.00	0.019	850.00	30.58	733.84	133.93	151.86	70.00%	105.10	28.83
944 WJ 086 C-WHITE	10.85	30.66%	4.95%	272.85	75.00	0.019	850.00	30.48	731.43	133.49	151.77	70.00%	104.70	28.78
944 WA 537 COACHMAN WHITE	10.86	30.61%	4.94%	272.42	75.00	0.019	850.00	30.46	730.93	133.40	151.96	70.00%	104.60	28.80
944 WJ 024 COLONIAL WHITE	12.45	30.29%	0.00%	269.58	0.00	0.019	850.00	27.10	650.47	118.71	184.18	70.00%	118.71	0.00
101-62485UHALT NEWMAR WHITE	10.01	30.00%	5.00%	267.00	75.00	0.019	850.00	27.64	663.33	121.06	141.23	70.00%	94.51	26.55
944 WT 175 ARCTIC WHITE	10.89	30.73%	4.96%	273.51	75.00	0.019	850.00	30.65	735.53	134.23	152.14	70.00%	105.35	28.89
944 WT 285 POLYCOP WHITE	10.87	30.75%	4.97%	273.68	75.00	0.019	850.00	30.60	734.34	134.02	151.77	70.00%	105.19	28.83
		Weight %												
Solvents/Cleaners/Release Agents		Organics												
ACETONE	6.56	0.00%	NA	NA	NA	0.0007	850.00	0.00	0.00	0.00	0.00	100.00%		
						Total		58.3	1399	255	836		240	28.9
						VOC Control	0%							
						PM Control	99.0%							
						Potential Before Controls				255	836			
						Potential After Controls				255	8.36			

Potential VOC From Resins/Gel, Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000lbs)

Potential VOC From Solvents, Pounds per Hour = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC From Solvents, Pounds per Day = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC From Solvents, Tons per Year = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

PM, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (1- Weight % Styrene) * (1 - Weight % MMA) * (1 - Transfer Efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Styrene emissions, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Styrene Emission Factor (lb/ton) * (1 ton Styrene / 2000 lbs Styrene) * (8760 hr/yr) * (1 ton / 2000 lbs)

MMA emissions, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * MMA Emission Factor (lb/ton) * (1 ton MMA / 2000 lbs MMA) * (8760 hr/yr) * (1 ton / 2000 lbs)

Emission Factors (lbs Styrene of MMA / ton resin or gelcoat) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Plant 43-2

Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 2000

Material	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Transfer Efficiency	Tons of Styrene per year	Tons of MMA per year
RESIN														
COR61-AC-490	10.84	39.00%	0.00%	89.00	na	0.058	1250.00	34.97	839.34	153.18	629.93	70.00%	153.18	0.00
COR74-736W	10.84	46.00%	0.00%	111.00	na	0.058	1250.00	43.62	1046.82	191.04	557.64	70.00%	191.04	0.00
STYPOL 040-4328	8.92	46.00%	0.00%	111.00	na	0.058	1250.00	35.89	861.40	157.21	458.87	70.00%	157.21	0.00
POLYLITE 33-540-00	9.17	45.00%	0.00%	108.00	na	0.058	1250.00	35.90	861.61	157.24	480.47	70.00%	157.24	0.00
GELCOAT														
944-LT-010 BLUE	10.26	31.68%	4.38%	281.95	60.00	0.021	1250.00	46.05	1105.15	201.69	231.19	70.00%	166.30	35.39
951-A3-443 LTD GRAY	10.68	30.41%	4.10%	270.64	60.00	0.021	1250.00	46.35	1112.34	203.00	245.84	70.00%	166.16	36.84
944-A-628 GRAY SANDING	10.68	35.38%	0.00%	336.00	0.00	0.021	1250.00	47.10	1130.37	206.29	238.03	70.00%	206.29	0.00
944-RT-005 SCARLET RED	10.17	31.08%	4.31%	276.61	60.00	0.021	1250.00	44.93	1078.35	196.80	231.34	70.00%	161.72	35.08
944-A-M17 NEWMAR GREY	10.59	35.30%	5.00%	336.00	75.00	0.021	1250.00	57.13	1371.03	250.21	224.52	70.00%	204.55	45.66
944-WT-006 NEWMAR WHITE	10.84	30.58%	4.93%	272.15	75.00	0.021	1250.00	49.39	1185.39	216.33	246.76	70.00%	169.60	46.74
951-WA-194 POLARIS WHITE	10.26	29.96%	9.97%	266.64	150.00	0.021	1250.00	56.11	1346.52	245.74	223.15	70.00%	157.27	88.47
944-IA-167 M.H. WHITE	11.09	32.98%	4.41%	294.00	60.00	0.021	1250.00	51.53	1236.65	225.69	245.07	70.00%	187.44	38.25
944-WT-144 ARCTIC WHITE	10.84	35.70%	5.00%	356.00	75.00	0.021	1250.00	61.32	1471.69	268.58	228.40	70.00%	221.85	46.74
944-NA-204 LT. ADOBE	10.43	32.81%	4.50%	292.02	75.00	0.021	1250.00	50.24	1205.82	220.06	230.85	70.00%	175.09	44.97
944-YA-085 PENSKE YELLOW	10.34	31.00%	4.26%	275.92	60.00	0.021	1250.00	45.59	1094.12	199.68	235.59	70.00%	164.01	35.67
944-WT-106 PENZOIL YELLOW	10.34	29.67%	4.08%	264.10	60.00	0.021	1250.00	43.98	1055.62	192.65	240.60	70.00%	156.99	35.67
944-NA-380 MOCHA BROWN	10.34	33.45%	4.59%	294.00	75.00	0.021	1250.00	50.08	1201.87	219.34	226.48	70.00%	174.76	44.58
945-GA-104 TOOLING GEL	9.01	42.71%	5.00%	501.00	75.00	0.021	1250.00	68.12	1634.77	298.35	169.14	70.00%	259.50	38.85
944-WT-013 PARCHMENT	10.26	30.64%	4.94%	272.71	75.00	0.021	1250.00	46.82	1123.78	205.09	233.32	70.00%	160.85	44.24
		Weight % Organics												
Solvents/Cleaners/Release Agents														
ACETONE	6.56	0.00%	NA	NA	NA	0.001	1250.00	0.00	0.00	0.00	0.00	100.00%		
CATALYST	9.76	0.00%	NA	NA	NA	0.001	1250.00	0.00	0.00	0.00	0.00	100.00%		
CATALYST	9.26	0.00%	NA	NA	NA	0.0004	1250.00	0.00	0.00	0.00	0.00	100.00%		

Potential VOC From Resins/Gel, Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * [Styrene Emission factor (lb/ton) + MMA Emission Factor (lb/ton)] * (1 ton/2000lbs)

Potential VOC From Solvents, Pounds per Hour = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC From Solvents, Pounds per Day = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC From Solvents, Tons per Year = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

PM, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (1- Weight % Styrene) * (1 - Weight % MMA) * (1 - Transfer Efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Styrene emissions, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Styrene Emission Factor (lb/ton) * (1 ton Styrene / 2000 lbs Styrene) * (8760 hr/yr) * (1 ton / 2000 lbs)

MMA emissions, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * MMA Emission Factor (lb/ton) * (1 ton MMA / 2000 lbs MMA) * (8760 hr/yr) * (1 ton / 2000 lbs)

Emission Factors (lbs Styrene of MMA / ton resin or gelcoat) taken from Unified Emission Factors for Open Molding of Composites). Composite Fabricators Association (CFA). April 1999

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

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Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
 2709 Patterson Street, Decatur, Indiana 46733
Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 2000

Plant 43-1

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Spray Booth (SB1)																
Polane "+"	14.86	17.90%	0.0%	17.9%	0.0%	63.10%	0.005	69	2.66	2.66	0.92	22.02	4.02	4.61	4.22	75%
Reducer 87	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.002	69	7.25	7.25	0.90	21.61	3.94	0.00	NA	75%
V66V44	9.32	27.50%	0.0%	27.5%	0.0%	62.10%	0.001	69	2.56	2.56	0.15	3.69	0.67	0.44	4.13	75%
R-T-S	12.45	29.94%	0.00%	29.94%	0.00%	48.18%	0.008	69	3.73	3.73	1.97	47.33	8.64	5.05	7.73	75%
Spray Booth (P1)																
Polane "+"	14.86	17.90%	0.0%	17.9%	0.0%	63.10%	0.005	69	2.66	2.66	0.92	22.02	4.02	4.61	4.22	75%
Reducer 87	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.002	69	7.25	7.25	0.90	21.61	3.94	0.00	NA	75%
V66V44	9.32	27.50%	0.0%	27.5%	0.0%	62.10%	0.001	69	2.56	2.56	0.15	3.69	0.67	0.44	4.13	75%
R-T-S	12.45	29.94%	0.00%	29.94%	0.00%	48.18%	0.008	69	3.73	3.73	1.97	47.33	8.64	5.05	7.73	75%

State Potential Emissions

Add worst case coating to all solvents

Control Efficiency

99.00%

Uncontrolled

3.94

94.7

17.3

10.1

Controlled

3.94

94.7

17.3

0.101

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

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Plant 43-1

Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
 2709 Patterson Street, Decatur, Indiana 46733
Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 2000

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Toluene-2, 4-diisocyanate	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Toluene-2, 4-diisocyanate Emissions (tons/yr)
Spray Booth (SB1)									
Polane "+"	14.86	0.00500	69.000	2.00%	1.00%	0.00%	0.45	0.22	0.00
R7K84 Reducer	7.25	0.00180	69.000	0.00%	20.00%	0.00%	0.00	0.79	0.00
V66V44	9.32	0.00087	69.000	0.00%	0.00%	0.80%	0.00	0.00	0.02
Spray Booth (P1)									
Polane "+"	14.86	0.00500	69.000	2.00%	1.00%	0.00%	0.45	0.22	0.00
R7K84 Reducer	7.25	0.00180	69.000	0.00%	20.00%	0.00%	0.00	0.79	0.00
V66V44	9.32	0.00087	69.000	0.00%	0.00%	0.80%	0.00	0.00	0.02
Individual Total							0.898	2.03	0.039
Total							2.96		

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 5 of 7 TSD App A

Plant 43-2

Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
 2709 Patterson Street, Decatur, Indiana 46733
Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 2000

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Prime Booths 1 and 2																
Seibert	9.30	30.30%	0.00%	30.30%	0.00%	64.70%	0.004	1250	2.82	2.82	13.07	313.63	57.24	32.92	4.36	75%
Clear Coat *	8.08	47.10%	0.0%	47.1%	0.0%	47.60%	0.007	1250	3.81	3.81	32.35	776.36	141.69	39.78	8.00	75%
Clear Coat Act *	9.40	10.00%	0.0%	10.0%	0.0%	87.00%	0.002	1250	0.94	0.94	2.00	47.94	8.75	19.69	1.08	75%
Base Coat *	10.66	60.50%	0.0%	60.5%	0.0%	38.00%	0.007	1250	6.45	6.45	54.82	1315.66	240.11	39.19	16.97	75%
Base Coat Act *	8.83	80.00%	0.0%	80.0%	0.0%	12.20%	0.000	1250	7.06	7.06	0.60	14.41	2.63	0.16	57.90	75%
Paint Booth (PB1)																
Polane "+"	14.86	17.90%	0.0%	17.9%	0.0%	63.10%	0.005	1250	2.66	2.66	16.62	398.99	72.82	83.49	4.22	75%
Reducer 87	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.001	1250	7.25	7.25	5.44	130.50	23.82	0.00	NA	75%
V66V44	9.32	27.50%	0.0%	27.5%	0.0%	62.10%	0.002	1250	2.56	2.56	4.81	115.34	21.05	13.87	4.13	75%
R-T-S	13.05	23.20%	0.00%	23.20%	0.00%	57.56%	0.007	1250	3.03	3.03	26.87	644.83	117.68	97.37	5.26	75%
State Potential Emissions									Control Eff	98.00%						
Add worst case coating to all solvents									Uncontrolled		130	3113	568	229		
									Controlled		130	3113	568	4.58		

METHODOLOGY

* Rarely Used

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

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Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
2709 Patterson Street, Decatur, Indiana 46733

Part 70: 001-6067

Plt ID: 001-00043

Reviewer: CarrieAnn Ortolani

Date: June 4, 1996

Plant 43-2

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % Toluene	Weight % Glycol Ethers	Weight % Toluene-2, 4-diisocyanate	Weight % Hexamethylene diisocyanate monomer	Weight % Formaldehyde	Xylene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Toluene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Toluene-2, 4-diisocyanate Emissions (tons/yr)	Hexamethylene diisocyanate monomer Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)
Prime Booths 1 and 2																	
Siebert	9.30	0.00371	1250.000	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	9.45	0.00	0.00	0.00	0.00	0.00
Clear Coat *	8.08	0.00680	1250.000	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	75.20	0.00	0.00	0.00
Clear Coat Act *	9.40	0.00170	1250.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.50%	0.00%	0.00	0.00	0.00	0.00	0.00	0.44	0.00
Base Coat *	10.66	0.00680	1250.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.50%	0.00	0.00	0.00	0.00	0.00	0.00	1.98
Base Coat Act *	8.83	0.00007	1250.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booth (PB1)																	
Polane "+"	14.86	0.00500	1250.000	2.00%	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	8.14	0.00	4.07	0.00	0.00	0.00	0.00
R7K84 Reducer	7.25	0.00060	1250.000	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	4.76	0.00	0.00	0.00	0.00
V66V44	9.32	0.00150	1250.000	0.00%	0.00%	0.00%	0.00%	0.80%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.61	0.00	0.00
Individual Total											8.14	9.45	8.83	75.2	0.612	0.437	1.98
Overall Total											105						

METHODOLOGY

* Rarely Used

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Dust Booths

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Company Name: Gold Shield Of Indiana, Inc.
Address City IN Zip: 2004 Patterson Street, Decatur, Indiana 46733 and
 2709 Patterson Street, Decatur, Indiana 46733
Part 70: 001-6067
Plt ID: 001-00043
Reviewer: CarrieAnn Ortolani
Date: June 4, 1996

Stack ID	PM Concentration (lbs/dscf)	Flow Rate (dscfm)	Control Efficiency (%)	PTE PM before controls (lbs/hr)	PTE PM before controls (tons/yr)	PTE PM after controls (lbs/hr)	PTE PM after controls (tons/yr)
D-1-1	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
D-1-2	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
D-2-1	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
D-2-2	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
D-2-3	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
D-2-4	6.150000E-07	21200	98.00%	39.1	171	0.782	3.43
Totals:				235	1028	4.69	20.6

METHODOLOGY

PM Concentration based on stack test.

PTE PM before controls (lbs/hr) = PM concentration (lbs/dscf) x Flow rate (dscfm) x (60 min / hr) / (1 - control efficiency)

PTE PM after controls (lbs/hr) = PM concentration (lbs/dscf) x Flow rate (dscfm) x (60 min / hr)

PTE PM after controls (tons/yr) = PTE PM (lbs/hr) x (8760 hrs / yr) x (1 ton / 2000 lbs)